EMERGENCY FILINGS RELATED TO UNLAWFUL SEARCH AND SEIZURE
BUTLER COUNTY COMMON PLEAS COURT

1. EMERGENCY MOTION TO QUASH ARREST WARRANT AND FOR IMMEDIATE RELEASE

Petitioner, by Guardian/Next Friend Lindsey-Morgan; Taylor, respectfully moves this Court to quash and set aside the arrest warrant sworn by agent Matt Murphy, issued on vague and generalized allegations, three hours after Petitioner filed a habeas corpus petition. The warrant lacks particularized probable cause, no named person, and no specific criminal act alleged. The arrest and seizure executed under this warrant constitute unlawful deprivation of liberty and due process violations.

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2. EMERGENCY MOTION FOR RETURN OF PROPERTY, INVENTORY, AND PRODUCTION OF WARRANT AFFIDAVIT

Law enforcement seized multiple electronic devices and other property from Petitioner's residence on [date], without providing a contemporaneous warrant affidavit or inventory. These items include phones, computers, and essential devices required for employment and communication. The seizure has deprived Petitioner of income and communications. Relief requested: immediate production of affidavit and inventory, return of non-contraband devices, preservation of chain of custody, and expedited hearing.

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3. EMERGENCY MOTION FOR EXPEDITED HEARING AND TEMPORARY RESTRAINING ORDER

Petitioner requests an expedited hearing within 24–48 hours and a TRO prohibiting law enforcement and bail agents from destroying, accessing, or transferring any seized property. Relief requested: restrain further seizures, preserve seized items, and compel disclosure of chain-of-custody documentation.

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4. SUPPLEMENTAL AFFIDAVIT — UNLAWFUL SEARCH, SEIZURE, AND RETALIATION

I, Lindsey-Morgan; Taylor, Guardian/Next Friend for William Charles Dunn, state as follows:

• On [date] at approximately [time], three (3) hours after filing a habeas corpus petition, law enforcement executed a warrant at my home, sworn by agent Matt Murphy alleging generalized 'drug trafficking and possession' without particularized facts.

• Agents damaged my home during the raid, including busting in my bathroom door and trim, leaving exposed nails dangerous to my dogs and toddler.

• I was not permitted access to my phone, water, cigarettes, or bathroom during the search. I was not read Miranda rights until after agents had already entered and were destroying my home.

• I was denied explanation of the warrant; when I refused to talk, agents stated they would not tell me why they were there. Only afterward did I learn the warrant alleged generalized crimes without naming Billy, despite his case being closed.

• Agents seized my electronic devices — including phones and computers — effectively cutting off my ability to communicate, earn income, and prepare legal defense. They sought 'Billy's phone and drugs,' yet seized my property and devices.

• The seizure and detention amount to retaliation for filing habeas corpus, and constitute fraud, coercion, kidnapping under color of law, and racketeering activity.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

_____ Date: 10/2/25

Lindsey-Morgan; Taylor, Guardian / Next Friend

NOTARY ACKNOWLEDGMENT

State of Ohio, County of Butler

Subscribed and sworn before me on this _____ day of _____, 2025, by Lindsey-Morgan; Taylor.

_____ Notary Public

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5. CERTIFICATE OF SERVICE

I hereby certify that on [date], true and correct copies of the foregoing Emergency Motions and Affidavit were served upon the following parties:

• Butler County Sheriff — by [Certified Mail RRR / Personal Service]

• Butler County Prosecutor — by [Certified Mail RRR / Hand Delivery]

• Fairfield City Police Chief — by [Certified Mail RRR / Personal Service]

• Clerk of Courts, Butler County Common Pleas Court — by filing/hand delivery and time-stamped copy obtained.

Executed by: _____ Date: _____

Lindsey-Morgan; Taylor, Guardian / Next Friend

SEARCH WARRANT

IN THE MATTER OF SEARCH OF: 5830 Reigart Road, Fairfield Township, OH, 45011.

STATE OF OHIO, BUTLER COUNTY, SS:

To The Butler County Sheriff, Deputy/Agent Matt Murphy, and all other Law Enforcement Officers:

Whereas, there appeared personally before me one Deputy/Agent Matt Murphy and swore to the facts set forth in an Affidavit on file with the Court in this matter.

Whereas, I find from said Affidavit that there is probable cause to believe:

I. **That in the Township of Fairfield, Butler County, Ohio, the following criminal offense(s) have occurred:**

O.R.C	**2925.03**	**Trafficking in Drugs**
O.R.C	**2925.11**	**Possession of Controlled Substances**

II. **That the following described items of property are connected with the commission of said offense(s):**

Fentanyl, cocaine, methamphetamine, or their derivatives, along with any other illegal drugs or drug related paraphernalia. U.S. currency proceeds and records of financial holdings evidencing the obtaining, expenditure or concealment of assets connected with the sale of illegal drugs, along with ledgers, and other documents. Cellular telephones, computers, computer files, photographs and audio/video recordings showing records of illegal drug sales. Barricades and surveillance devices used for fortification and/or protection. Documents showing possessory interest in **5830 Reigart Road, Fairfield Township, OH, 45011**. All weapons or any other property associated with the sale of drugs. Any safes, security boxes, storage rooms, vehicles or outbuildings, persons entering, exiting, present or associated with or upon the curtilage of said apartment. Your affiant requests authorization to execute the warrant during the daytime or **nighttime** for officer safety.

III. **That the said items of property are concealed either:**

A. **Upon the person(s) of:**

1. Not Applicable.

B. **And/or at the following place(s):**

5830 Reigart Road, Fairfield Township, OH, 45011. The residence is a single-family dwelling with a mailbox affixed at the end of the driveway bearing the numbers "**5830**". It is a single-story residence constructed of aluminum and vinyl. The siding is white and it has a shingled roof, covered porch, and brick chimney. The Butler County Auditor identifies 5830 Reigart Road, Fairfield Township, OH, 45011 with Parcel ID:

A0300050000009. The Affiant can identify on site. To include any safes, security boxes, storage rooms, vehicles or outbuildings, persons entering, exiting, present or associated with or upon the curtilage of said residence, and there diligently search for and seize certain goods and chattels or articles.

NOW, THEREFORE, you are hereby **COMMANDED**, in the name of the State of Ohio, with necessary and proper assistance, within three days, to enter into the place(s) described in Paragraph III, (B) above, and there diligently search for the property described in Paragraph II above. Within the territorial jurisdiction of this Court, you are authorized to search the person(s) described in Paragraph III, (A1) above for the items of property described in Paragraph II above. Of this Warrant make due return to the undersigned or clerk of court, accompanied by an inventory of any property seized.

All property seized pursuant to this Warrant shall be forthwith delivered into the custody of the Police Department Evidence Custodian to be held as evidence or until further Order of this Court.

The facts upon which the Affiant relies and bases his/her belief that said items of property and things are so unlawfully concealed are contained in Paragraph IV of the Affidavit, which is filed in support of this Warrant and is incorporated herein.

Electronically Signed
2025-09-19 6:28 pm EDT

DATE/TIME

JUDGE
Butler County Court of Common Pleas